



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

Application granted. The briefing schedule is extended
as set forth herein.

STATE COUNSEL
ON BUREAU

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
December 13, 2021

VIA ECF

Hon. Philip M. Halpern
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: **Johnson v. McMorrow, et al., 19-cv-6480 (PMH)(AEK)**

Dear Judge Halpern:

This Office represents the Defendants Trooper Andrew McMorrow and Trooper Marisa Rodriguez ("Defendants") in the above-referenced action. We write Your Honor seeking to extend the deadlines set forth in the Motion for Summary Judgment briefing schedule. We have conferred with plaintiff's counsel and he consents to this request.

The reason for the extension is due to the undersigned leaving the employ of the Attorney General's Office effective as of December 23, 2021. A Notice of Withdrawal will be filed prior to that date. As such, this matter will be reassigned to another attorney and the extension would allow the new attorney an opportunity to become familiar with the file and prepare the appropriate motion papers.

Accordingly, the undersigned respectfully proposes the following deadline:

- A) Defendants' time to serve the motion from December 30, 2021 to **January 31, 2022;**
- B) Plaintiff's time to serve his opposition from January 31, 2022 to **March 1, 2022;**
- C) Reply to be served from February 14, 2022 to **March 15, 2022.**

Page 2

We thank the Court in advance for consideration of this request.

Respectfully submitted,

S/ Julie A. Ortiz
Julie A. Ortiz
Assistant Attorney General
Assistant Attorney General
28 Liberty Street, 18th Floor
New York, NY 10005
(212) 416-8476
Julie.Ortiz@ag.ny.gov

All Counsel, via ECF